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September 21, 2021

via e-file only

Honorable Judge William J. Martini, U.S.D.J.
United States District Court
Martin Luther King, Jr., Building and U.S. Courthouse
50 Walnut Street, Newark, New Jersey 07102

**RE: *Elizabeth McNair, et al. v. State of New Jersey, et al.*,
Civil Action No: 2:21-cv-01291-WJM-MF
Request to Carry Motion Two Cycles**

Your Honor:

This office represents Ms. Elizabeth McNair and the Estate of Darrell Smith in this matter. As a result of an unexpected and tragic death that occurred last week, I am currently addressing family issues state-side and will likely do the same out of the country over the next couple of weeks.

Accordingly, in the same vein as my September 16th letter requesting an adjournment to the pending *motion to strike*, I write to request that the Court carry the pending *motion to dismiss*, currently returnable **October 4, 2021**, preferably **two cycles**—in an abundance of caution for anticipated international travel—setting the new return date as **November 1, 2021**.

All counsel have consented to this request.

The Court's attention and courtesy to this matter is greatly appreciated.

HINSON SNIPES, LLP

By:


Tracey C. Hinson, Esquire

TCH/edd

Cc: All Counsel via ECF

